

Exhibit 7

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF’S FIRST SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO
UBER’S FIRST SET OF
INTERROGATORIES (NOS. 1-11)**

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INTERROGATORY NO. 6:

Separately for each alleged Waymo trade secret identified in response to Interrogatory No. 1, describe how long it took and how much it cost to develop.

RESPONSE TO INTERROGATORY NO. 6:

Waymo incorporates by reference its General Objections. Waymo further objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, and oppressive, including to the extent that it asks Waymo to respond “[s]eparately for each alleged Waymo trade secret.” Waymo further objects to this request to the extent it is compound, complex, and contains multiple subparts.

Subject to and without waiving the foregoing General and Specific Objections, Waymo responds as follows:

Waymo began developing its in-house LiDAR systems in 2011. Waymo’s development of its in-house LiDAR systems drew from development efforts of 510 Systems, led by engineer Pierre-Yves Droz. 510 Systems began developing a [REDACTED] LiDAR in 2009; by December 2010, these efforts had led to a prototype code-named “Little Bear” (“LBr”). In early summer 2011, 510 Systems began developing LiDAR systems for self-driving applications, building on the success of LBr. However, because of [REDACTED] that 510 Systems learned from its experience with LBr, 510 Systems proceeded with development of two distinct LiDAR designs: a LiDAR system for long ranges (“Papa Bear” or “PBr”) and a separate LiDAR system for medium ranges (“Mama Bear” or “MBr”). *See* Droz Decl. ¶¶ 5-7.

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1 In July 2011, Waymo acquired 510 Systems. Since the acquisition, Waymo’s LiDAR
2 team has grown from 6 people when Waymo acquired 510 Systems to approximately [REDACTED] people
3 today. *Id.* ¶ 7.

4 In 2011, Waymo’s self-driving cars were using an off-the-shelf LiDAR device (the
5 Velodyne HDL64), which cost approximately \$70,000. Waymo spent years working on a variety
6 of possible LiDAR designs that proved not to work. Waymo’s experience with these “dead-end”
7 designs helped lead Waymo to the architecture now at the heart of its current LiDAR systems. *Id.*
8 ¶ 10-12.

9 Designing and developing LiDAR systems is a difficult and time-consuming process that
10 requires significant experience with using LiDAR systems for the desired application — in
11 Waymo’s case, self-driving cars. Thanks to Waymo’s experience with self-driving cars dating
12 back to 2009, Waymo had the knowledge required for optimizing LiDAR for self-driving car test
13 scenarios. Optimization is difficult and time-consuming, as [REDACTED]
14 [REDACTED]. As discussed above, early on, Waymo
15 realized that different LiDAR designs would be required to satisfy all the needed self-driving car
16 test scenarios for different ranges.

17 For example, for long ranges, [REDACTED]
18 [REDACTED]. Early development of PBr involved [REDACTED]
19 [REDACTED] — a solution that did not
20 work. After trying several other designs and building several different prototypes of Papa Bear,
21 Waymo began equipping its fleet (in [REDACTED]) with version 5 of PBr, which was [REDACTED]
22 [REDACTED] proved not to work for self-driving cars. Waymo
23 thus iterated more designs of Papa Bear, eventually settling on the PBr design that it still uses on
24 its self-driving fleet. Waymo is not aware of viable alternatives for long-range LiDAR. *See id.*
25 ¶¶ 9-10.

26 Development of Waymo’s mid-range LiDAR system was equally, if not more, difficult,
27 time-consuming, and expensive than development of PBr. In parallel with PBr design, beginning
28 in 2011, Waymo worked on MBr, which [REDACTED]. After more

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1 than a year of work on MBr, however, this design proved not to be viable for use in self-driving
2 cars. Accordingly, in late 2012, Waymo decided to abandon MBr and came up with an entirely
3 new design for a mid-range LiDAR, codenamed “Grizzly Bear” (or “GBr”). *See id.* ¶ 11.

4 Beginning in December 2012, Waymo began devoting many resources into developing the
5 mid-range GBr LiDAR. GBr was a very different and innovative design made possible by all the
6 know-how and technological capabilities Waymo’s LiDAR team had developed over several years
7 of working on LiDAR systems. In contrast to commercially available LiDAR systems, such as the
8 Velodyne system originally used by Waymo, GBr had many advantages: [REDACTED]

9 [REDACTED]
10 [REDACTED]
11 [REDACTED]. *See id.*
12 ¶ 12.

13 One of GBr’s innovations was a design that it eventually patented: its use of a single lens
14 — rather than multiple sets of lenses — to both transmit and receive the collection of laser beams
15 used to scan the surrounding environment. Traditionally, a multi-beam LiDAR system used lens
16 assemblies with multiple elements (such as one lens for the transmit side and another for the
17 receive side), but this approach was not practical in a self-driving car LiDAR because of the
18 significant size and cost of the system due to the complexity of manufacturing numerous complex
19 lens elements. *See id.* ¶¶ 13-14. Waymo first pioneered its single-lens design in GBr. GBr’s
20 single-lens design makes the focal plane curved, complicating the optical layout. Accordingly,
21 Waymo developed many innovations, some patented and some maintained as trade secrets, to deal
22 with the more complicated optical layout and allowed Waymo to get the small-size and low-cost
23 benefits of a single-lens system. *See id.* ¶ 15.

24 In [REDACTED], Waymo rolled out the second generation of its mid-range LiDAR — GBr2.
25 The GBr design (as refined in GBr2), was groundbreaking, as it significantly reduced the cost and
26 size of the LiDAR system while increasing performance. To get to this point, it took Waymo two
27 years from when it first set out to build an in-house mid-range LiDAR for self-driving car
28 applications. Development of GBr2 required solving innumerable issues, which Waymo

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1 accomplished by devoting significant resources. The issues Waymo spent time and money
2 resolving, and the solutions to those issues, are something a LiDAR designer not previously
3 familiar with Waymo’s designs could not address in advance. *See id.* ¶¶ 17-18.

4 Through Waymo’s many months of design and development, Waymo finally switched
5 from off-the-shelf Velodyne LiDAR systems to its in-house GBr2 LiDAR [REDACTED]
6 [REDACTED], almost three years after Waymo first started developing its in-house mid-range LiDAR and
7 approximately one year after Waymo first came up with the single-lens concept for GBr. *See id.*
8 ¶ 19.

9 Waymo’s mid-range LiDAR development did not stop then. It continued spending time
10 and resources on improving GBr2, leading to the current-generation of Waymo’s mid-range
11 LiDAR, known internally as GBr3, which adds innovations onto the same foundation as GBr and
12 GBr2, including [REDACTED].
13 These arrangements were designed — based on Waymo’s years of testing, simulation,
14 experimentation, and optimization for different test scenarios — for use in self-driving cars.
15 These designs result in GBr3 [REDACTED]
16 [REDACTED]
17 [REDACTED]. *See id.* ¶ 20.

18 Waymo spent much time, effort, and resources developing GBr3. As just one example,
19 Waymo’s trade secret [REDACTED]

20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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1 [REDACTED]
2 [REDACTED]. *See*
3 *id.* ¶ 21.

4 Building on these insights, Waymo spent enormous time, simulation, and resources to
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED]
10 [REDACTED]. *See id.*
11 ¶ 22.

12 In brief, Waymo’s LiDAR development efforts led to the replacement of the Velodyne
13 HDL64 with an in-house LiDAR solution that was one third the size and one tenth the cost.
14 Waymo’s research and development efforts into LiDAR technology also led to the creation of a
15 new type of LiDAR to cover long-range perception needs with [REDACTED]
16 [REDACTED], as well as a low-cost short-range LiDAR with [REDACTED]
17 [REDACTED]. By [REDACTED], Waymo’s test fleet was equipped exclusively with
18 Waymo’s in-house LiDAR systems.

19 Even after the success of Waymo’s in-house LiDAR designs, Waymo’s LiDAR research
20 and development efforts are ongoing and have led to additional innovations, many maintained as
21 trade secrets, beyond those incorporated into its PBr, GBr, and TBr LiDARs. For example,
22 Waymo’s extensive experience driving using a fleet equipped with its proprietary LiDAR systems
23 (which recently surpassed a total of 3 million miles, with 1 million miles driven from October
24 2016 to May 2017) has led Waymo to realize that [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED].
28

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1 These recent development efforts have resulted in several major improvements to
 2 Waymo’s technology, most or all of which are maintained as trade secrets. For example, [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13

14 **FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6:**

15 Waymo incorporates by reference its General Objections. Waymo further objects to this
 16 request to the extent it is compound, complex, and contains multiple subparts.

17 Subject to and without waiving the foregoing General and Specific Objections, Waymo
 18 responds as follows:

19 Waymo does not track “how long it took” and “how much it cost to develop” each of its
 20 trade secrets separately in the ordinary course of business. With respect to documents evincing
 21 how long it took to develop each of Waymo’s trade secrets, Waymo responds under Rule 33(d)
 22 and incorporates by reference its response to Interrogatory No. 4, 5, as well as any and all
 23 supplements thereto. In particular, Waymo intends to rely on those documents identified in
 24 response to Interrogatory No. 4 to, in part, show the time and cost to develop its asserted trade
 25 secrets. Waymo further intends to rely on knowledgeable witnesses identified in response to
 26 Interrogatory No. 5 to testify regarding these subjects. Additional information regarding
 27 Waymo’s response to this interrogatory can be found at WAYMO-UBER-00012830, WAYMO-
 28 UBER-00014506, WAYMO-UBER-00027045, WAYMO-UBER-00027046, WAYMO-UBER-

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1 00014489, WAYMO-UBER-00013348, WAYMO-UBER-00014078 and WAYMO-UBER-
2 00026471.

Trade Secrets 1, 2, 3, 4, 6 and 39

4 The total development work associated with Trade Secrets 1, 2, 3, 4, 6, and 39 took
5 [REDACTED]. Further detail regarding the timeline for the development of these trade
6 secrets can be found in the documents identified in response to Interrogatory No. 4, which Waymo
7 incorporates by reference pursuant to Federal Rule of Civil Procedure 33(d). Waymo does not
8 track costs on a trade secret by trade secret basis in the ordinary course of business, and the cost of
9 developing Trade Secrets 1, 2, 3, 4, 6, and 39 will be the subject of expert testimony. Information
10 potentially relevant to determining such cost estimates includes information that has been
11 produced at WAYMO-UBER-00027045, WAYMO-UBER-00014506, WAYMO-UBER-
12 00012830, WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That information
13 reflects that [REDACTED]

14 [REDACTED].

15 Waymo’s time and cost to develop trade secrets related to [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED]
18 [REDACTED]. For example, to develop
19 Trade Secrets 1, 2, 3, 4, 6, and 39, Waymo spent considerable time and incurred substantial
20 expense [REDACTED]

21 [REDACTED]
22 [REDACTED] [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED] [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]. As another example, Waymo spent

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1 considerable time and incurred significant expense [REDACTED]

2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]

12 Waymo provides these examples as context for its interrogatory response, even though
13 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
14 complete description or analysis of its development efforts here.

15 **Trade Secret 46**

16 The total development work associated with Trade Secret 46 took [REDACTED]
17 [REDACTED]. Further detail regarding the timeline for the development of this trade secret can be found
18 in the documents identified in response to Interrogatory No. 4, which Waymo incorporates by
19 reference pursuant to Federal Rule of Civil Procedure 33(d). Waymo does not track costs on a
20 trade secret by trade secret basis in the ordinary course of business, and the cost of developing
21 Trade Secret 46 will be the subject of expert testimony. Information potentially relevant to
22 determining such cost estimates includes information that has been produced at WAYMO-UBER-
23 00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078
24 and WAYMO-UBER-00014489. That information reflects that [REDACTED]

25 [REDACTED].

26 In assessing the time it took and how much it cost to develop trade secrets related to the

27 [REDACTED]
28 [REDACTED]

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1 [REDACTED]. For example, to develop Trade Secret 46, Waymo
 2 spent considerable time and incurred substantial expense [REDACTED] [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]. As another example, Waymo
 12 spent considerable time and incurred substantial expense [REDACTED]
 13 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED].

17 Waymo provides these examples as context for its interrogatory response, even though
 18 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
 19 complete description or analysis of its development efforts here.

Trade Secret 62

20
 21 The total development work associated with Trade Secret 62 took [REDACTED]
 22 [REDACTED]. Further detail regarding the timeline for the development of this trade secret can be found
 23 in the documents identified in response to Interrogatory No. 4. Waymo does not track costs on a
 24 trade secret by trade secret basis in the ordinary course of business, and the cost of developing
 25 Trade Secret 62 will be the subject of expert testimony. Information potentially relevant to
 26 determining such cost estimate has been produced at WAYMO-UBER-00027045, WAYMO-
 27 UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-
 28

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1 UBER-00014489. That information reflects that [REDACTED]

2 [REDACTED].

3 In assessing the time it took and how much it cost to develop trade secrets related to [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]. For example, to develop Trade Secret 62, Waymo spent considerable time

7 and incurred substantial expense [REDACTED]

8 [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED]

14 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

15 [REDACTED]

16 [REDACTED]. As another example, Waymo spent considerable time and incurred substantial expense

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED].

22 Waymo provides these examples as context for its interrogatory response, even though
23 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
24 complete description or analysis of its development efforts here.

Trade Secrets 75-80

26 The total development work associated with Trade Secrets 75-80 took [REDACTED]

27 [REDACTED] Further detail regarding the timeline for the development of these trade secrets can be
28 found in the documents identified in response to Interrogatory No. 4. Waymo does not track costs

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1 on a trade secret by trade secret basis in the ordinary course of business, and the cost of
 2 developing each of Trade Secrets 75-80 will be the subject of expert testimony. Information
 3 potentially relevant to determining such cost estimates has been produced at WAYMO-UBER-
 4 00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-
 5 00014078 and WAYMO-UBER-00014489. That information reflects [REDACTED]

6 [REDACTED]
 7 [REDACTED]
 8 Waymo’s development of Trade Secrets 75-80 [REDACTED]

9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED].

22 Waymo provides these examples as context for its interrogatory response, even though
 23 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
 24 complete description or analysis of its development efforts here.

Trade Secret 91

25
 26 The total development work associated with Trade Secret 91 took [REDACTED]
 27 [REDACTED]. Further detail regarding the timeline for the development of this trade secret can be found
 28 in the documents identified in response to Interrogatory No. 4. Waymo does not track costs on a

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1 trade secret by trade secret basis in the ordinary course of business, and the cost of developing
2 Trade Secret 91 will be the subject of expert testimony. Information potentially relevant to
3 determining such cost estimates has been produced at WAYMO-UBER-00027045, WAYMO-
4 UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-
5 UBER-00014489. That information reflects that [REDACTED]

6 [REDACTED].

7 Waymo’s development of Trade Secret 91 [REDACTED]

8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED].

24 Waymo provides these examples as context for its interrogatory response, even though
25 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
26 complete description or analysis of its development efforts here.

27 **Trade Secret 85**
28

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1 The total development work associated with Trade Secret 85 took [REDACTED]
 2 [REDACTED]. Further detail regarding the timeline for the development of this trade secret can be found
 3 in the documents identified in response to Interrogatory No. 4. Waymo does not track costs on a
 4 trade secret by trade secret basis in the ordinary course of business, and the cost of developing
 5 Trade Secret 85 will be the subject of expert testimony. Information potentially relevant to
 6 determining such cost estimate has been produced at WAYMO-UBER-00027045, WAYMO-
 7 UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-
 8 UBER-00014489. That information reflects that [REDACTED]
 9 [REDACTED].

10 Waymo’s development of Trade Secret 85 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]

16 Waymo provides these examples as context for its interrogatory response, even though
 17 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
 18 complete description or analysis of its development efforts here.

Trade Secrets 81-84

19 The total development work associated with Trade Secrets 81-84 took [REDACTED]
 20 [REDACTED]. Further detail regarding the timeline for the development of these trade secrets can be
 21 found in the documents identified in response to Interrogatory No. 4. Waymo does not track costs
 22 on a trade secret by trade secret basis in the ordinary course of business, and the cost of
 23 developing each of Trade Secrets 81-84 will be the subject of expert testimony. Information
 24 potentially relevant to determining such cost estimates has been produced at WAYMO-UBER-
 25 00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-
 26 00014078 and WAYMO-UBER-00014489. That information reflects that [REDACTED] [REDACTED]
 27 [REDACTED]
 28 [REDACTED]

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1 [REDACTED]

2 [REDACTED]

3 Waymo’s development of Trade Secrets 81-84 [REDACTED]

4 [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 Waymo provides these examples as context for its interrogatory response, even though
13 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
14 complete description or analysis of its development efforts here.

15 **Trade Secrets 86-88**

16 The total development work associated with Trade Secrets 86-88 took [REDACTED]

17 [REDACTED] Further detail regarding the timeline for the development of these trade secrets can be
18 found in the documents identified in response to Interrogatory No. 4. Waymo does not track costs
19 on a trade secret by trade secret basis in the ordinary course of business, and the cost of
20 developing each of Trade Secrets 81-84 will be the subject of expert testimony. Information
21 potentially relevant to determining such cost estimates has been produced at WAYMO-UBER-
22 00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-
23 00014078 and WAYMO-UBER-00014489. That information reflects [REDACTED] [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 In assessing the time it took and how much it cost to develop trade secrets related to the

27 [REDACTED]

28 [REDACTED]

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1 For example, to develop Trade Secrets 86-88, Waymo spent considerable time and incurred
 2 substantial expense [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 As another example, Waymo spent considerable time and incurred substantial expense [REDACTED]

10 [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Waymo provides these examples as context for its interrogatory response, even though
 16 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
 17 complete description or analysis of its development efforts here.

Trade Secret 90

18
 19 Waymo’s development of Trade Secret 90 took [REDACTED]. Further detail
 20 regarding the timeline for the development of this trade secret can be found in the documents
 21 identified in response to Interrogatory No. 4. Waymo does not track costs on a trade secret by
 22 trade secret basis in the ordinary course of business, and the cost of developing Trade Secret 90
 23 will be the subject of expert testimony. Information potentially relevant to determining such cost
 24 estimate has been produced at WAYMO-UBER-00027045, WAYMO-UBER-00014506,
 25 WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That
 26 information reflects that [REDACTED]

27 [REDACTED]

28

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1 In assessing the time it took and how much it cost to develop [REDACTED]
2 [REDACTED]
3 [REDACTED] For example, to develop Trade
4 Secret 90, Waymo spent considerable time and incurred substantial expense [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED] As another
15 example, Waymo spent considerable time and incurred substantial expense [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 Waymo provides these examples as context for its interrogatory response, even though
23 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
24 complete description or analysis of its development efforts here.

25 Trade Secrets 94-99 and 103

26 The total development work associated with Trade Secrets 94-99 and 103 took
27 [REDACTED]. Further detail regarding the timeline for the development of these trade
28 secrets can be found in the documents identified in response to Interrogatory No. 4. Waymo does

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1 not track costs on a trade secret by trade secret basis in the ordinary course of business, and the
2 cost of developing each of Trade Secrets 94-99 and 103 will be the subject of expert
3 testimony. Information potentially relevant to determining such cost estimates has been produced
4 at WAYMO-UBER-00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830,
5 WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That information reflects that [REDACTED]

6 [REDACTED]
7 [REDACTED].

8 In assessing the time it took and how much it cost to develop trade secrets related to [REDACTED]

9 [REDACTED]
10 [REDACTED]
11 [REDACTED]. For example, to develop Trade

12 Secrets 94-99 and 103, Waymo spent considerable time and incurred substantial expense

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 [REDACTED] As another example, Waymo spent considerable time and incurred substantial
22 expense [REDACTED]

23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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1 Waymo provides these examples as context for its interrogatory response, even though
2 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
3 complete description or analysis of its development efforts here.

Trade Secret 104

4
5 The total development work associated with Trade Secret 104 took [REDACTED]
6 [REDACTED]. Further detail regarding the timeline for the development of this trade secret can be found
7 in the documents identified in response to Interrogatory No. 4. Waymo does not track costs on a
8 trade secret by trade secret basis in the ordinary course of business, and the cost of developing
9 Trade Secret 104 will be the subject of expert testimony. Information potentially relevant to
10 determining such cost estimate has been produced at WAYMO-UBER-00027045, WAYMO-
11 UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-
12 UBER-00014489. That information reflects that [REDACTED]

13 [REDACTED]
14 [REDACTED]
15 Waymo’s development of Trade Secret 104 [REDACTED]
16 [REDACTED]
17 [REDACTED] [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED] [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]

6 Waymo provides these examples as context for its interrogatory response, even though
7 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
8 complete description or analysis of its development efforts here.

Trade Secret 105

9
10 The total development work associated with Trade Secret 105 took [REDACTED]
11 [REDACTED] Further detail regarding the timeline for the development of this trade secret can be found
12 in the documents identified in response to Interrogatory No. 4. Waymo does not track costs on a
13 trade secret by trade secret basis in the ordinary course of business, and the cost of developing
14 Trade Secret 105 will be the subject of expert testimony. Information potentially relevant to
15 determining such cost estimate has been produced at WAYMO-UBER-00027045, WAYMO-
16 UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-
17 UBER-00014489. That information reflects that [REDACTED]

18 [REDACTED]
19 [REDACTED]

20 Waymo’s development of Trade Secret 105 [REDACTED]

21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]

8 Waymo provides these examples as context for its interrogatory response, even though
 9 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
 10 complete description or analysis of its development efforts here.

11 **Trade Secret 106**

12 Waymo’s development of Trade Secret 106 took [REDACTED]. Further detail
 13 regarding the timeline for the development of this trade secret can be found in the documents
 14 identified in response to Interrogatory No. 4. Waymo does not track costs on a trade secret by
 15 trade secret basis in the ordinary course of business, and the cost of developing Trade Secrets 106
 16 will be the subject of expert testimony. Information potentially relevant to determining such cost
 17 estimate has been produced at WAYMO-UBER-00027045, WAYMO-UBER-00014506,
 18 WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That
 19 information reflects that [REDACTED]

20 [REDACTED].

21 Waymo’s development of Trade Secret 106 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]
 26 [REDACTED]
 27 [REDACTED]
 28 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]

11 Waymo provides these examples as context for its interrogatory response, even though
12 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
13 complete description or analysis of its development efforts here.

Trade Secret 107

14
15 Waymo’s development of Trade Secret 107 took [REDACTED]. Further detail
16 regarding the timeline for the development of this trade secret can be found in the documents
17 identified in response to Interrogatory No. 4. Waymo does not track costs on a trade secret by
18 trade secret basis in the ordinary course of business, and the cost of developing Trade Secret 107
19 will be the subject of expert testimony. Information potentially relevant to determining such cost
20 estimates has been produced at WAYMO-UBER-00027045, WAYMO-UBER-00014506,
21 WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That
22 information reflects that [REDACTED]

23 [REDACTED].

24 Waymo’s development of Trade Secret 107 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]

13 Waymo provides these examples as context for its interrogatory response, even though
14 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
15 complete description or analysis of its development efforts here.

16 Trade Secret 108

17 Waymo’s development of Trade Secret 108 took [REDACTED]. Further detail
18 regarding the timeline for the development of this trade secret can be found in the documents
19 identified in response to Interrogatory No. 4. Waymo does not track costs on a trade secret by
20 trade secret basis in the ordinary course of business, and the cost of developing Trade Secret 108
21 will be the subject of expert testimony. Information potentially relevant to determining such cost
22 estimates has been produced at WAYMO-UBER-00027045, WAYMO-UBER-00014506,
23 WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That
24 information reflects that [REDACTED]

25 [REDACTED].

26 Waymo’s development of Trade Secret 108 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 Waymo provides these examples as context for its interrogatory response, even though
15 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
16 complete description or analysis of its development efforts here.

17 **Trade Secret 109**

18 The total development work associated with Trade Secret 109 took [REDACTED]
19 [REDACTED] Further detail regarding the timeline for the development of this trade secret can be found
20 in the documents identified in response to Interrogatory No. 4. Waymo does not track costs on a
21 trade secret by trade secret basis in the ordinary course of business, and the cost of developing
22 Trade Secret 109 will be the subject of expert testimony. Information potentially relevant to
23 determining such cost estimates has been produced at WAYMO-UBER-00027045, WAYMO-
24 UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-
25 UBER-00014489. That information reflects that [REDACTED]
26 [REDACTED].

27 Waymo’s development of Trade Secret 109 [REDACTED]
28 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]

11 Waymo provides these examples as context for its interrogatory response, even though
12 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
13 complete description or analysis of its development efforts here.

14 **Trade Secret 110**

15 The total development work associated with Trade Secret 110 took [REDACTED]
16 [REDACTED] Further detail regarding the timeline for the development of this trade secret can be found
17 in the documents identified in response to Interrogatory No. 4. Because Waymo does not track
18 costs on a trade secret by trade secret basis in the ordinary course of business, the cost of
19 developing Trade Secret 110 will be the subject of expert testimony. Information potentially
20 relevant to determining such cost estimates has been produced at WAYMO-UBER-
21 00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-
22 00014078 and WAYMO-UBER-00014489. That information reflects that [REDACTED]

23 [REDACTED]
24 [REDACTED]

25 In assessing the time it took and how much it cost to develop trade secrets related to [REDACTED]

26 [REDACTED]
27 [REDACTED]
28 [REDACTED] For example, to develop Trade Secret 110,

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1 Waymo spent considerable time and incurred substantial expense [REDACTED]

2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]

10 [REDACTED] As another example, Waymo spent considerable time and incurred substantial
 11 expense [REDACTED] [REDACTED]

12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED].

17 Waymo provides these examples as context for its interrogatory response, even though
 18 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
 19 complete description or analysis of its development efforts here.

Trade Secret 112

20
 21 The total development work associated with Trade Secret 112 took [REDACTED]
 22 [REDACTED] Further detail regarding the timeline for the development of this trade secret can be found
 23 in the documents identified in response to Interrogatory No. 4. Because Waymo does not track
 24 costs on a trade secret by trade secret basis in the ordinary course of business, the cost of
 25 developing Trade Secret 112 will be the subject of expert testimony. Information potentially
 26 relevant to determining such cost estimates has been produced at WAYMO-UBER-
 27 00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-
 28 00014078 and WAYMO-UBER-00014489. That information reflects that [REDACTED] [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 In assessing the time it took and how much it cost to develop trade secrets related to the
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]. For example, to develop Trade Secret 112,
7 Waymo spent considerable time and incurred substantial expense [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]. As another
16 example, Waymo spent considerable time and incurred substantial expense [REDACTED]
17 [REDACTED] [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]. Waymo provides these examples as context for its interrogatory response, even though
21 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
22 complete description or analysis of its development efforts here. Waymo’s knowhow regarding
23 this abandoned design is further informed by the knowledge learned and gained regarding cost,
24 manufacturability, reliability and complexity for this type of LIDAR design.

Trade Secret 113

25
26 The total development work associated with Trade Secret 113 took [REDACTED]
27 [REDACTED] Further detail regarding the timeline for the development of this trade secret can be found
28 in the documents identified in response to Interrogatory No. 4. Because Waymo does not track

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1 costs on a trade secret by trade secret basis in the ordinary course of business, the cost of
2 developing Trade Secret 113 will be the subject of expert testimony. Information potentially
3 relevant to determining such cost estimates has been produced at WAYMO-UBER-
4 00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-
5 00014078 and WAYMO-UBER-00014489. That information reflects that [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 In assessing the time it took and how much it cost to develop trade secrets related to [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED] For example, to develop Trade Secret 113,
12 Waymo spent considerable time and incurred substantial expense [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]. As another
21 example, Waymo spent considerable time and incurred substantial expense [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

27 [REDACTED]

28

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1 Waymo provides these examples as context for its interrogatory response, even though
 2 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
 3 complete description or analysis of its development efforts here.

Trade Secret 118

4
 5 The total development work associated with Trade Secret 118 took [REDACTED]
 6 [REDACTED]. Further detail regarding the timeline for the development of this trade secret can be found
 7 in the documents identified in response to Interrogatory No. 4. Because Waymo does not track
 8 costs on a trade secret by trade secret basis in the ordinary course of business, the cost of
 9 developing Trade Secret 118 will be the subject of expert testimony. Information potentially
 10 relevant to determining such cost estimates has been produced at WAYMO-UBER-
 11 00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-
 12 00014078 and WAYMO-UBER-00014489. That information reflects [REDACTED]

13 [REDACTED]
 14 In assessing the time it took and how much it cost to develop trade secrets related to the
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]. For example, to develop Trade Secret 118,
 18 Waymo spent considerable time and incurred substantial expense [REDACTED]

19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]
 26 [REDACTED]. As another
 27 example, Waymo spent considerable time and incurred substantial expense [REDACTED]

28 [REDACTED], [REDACTED],

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Waymo provides these examples as context for its interrogatory response, even though such context is not called for by the interrogatory. Waymo does not purport to offer a full and complete description or analysis of its development efforts here.

Trade Secret 119

The total development work associated with Trade Secret 119 took [REDACTED]. Further detail regarding the timeline for the development of this trade secret can be found in the documents identified in response to Interrogatory No. 4. Because Waymo does not track costs on a trade secret by trade secret basis in the ordinary course of business, the cost of developing Trade Secret 119 will be the subject of expert testimony. Information potentially relevant to determining such cost estimates has been produced at WAYMO-UBER-00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That information reflects that [REDACTED].

In assessing the time it took and how much it cost to develop trade secrets related to the [REDACTED]. For example, to develop Trade Secret 119, Waymo spent considerable time and incurred substantial expense [REDACTED].

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]. As another
4 example, Waymo spent considerable time and incurred substantial expense [REDACTED]

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]

11 Waymo provides these examples as context for its interrogatory response, even though
12 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
13 complete description or analysis of its development efforts here.

Trade Secret 121

14
15 Waymo is investigating how long it took to develop Trade Secret 121. But, [REDACTED]

16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

Trade Secrets 92 and 93

26
27 The total development work associated with Trade Secrets 92 and 93 took [REDACTED]

28 [REDACTED] Further detail regarding the timeline for the development of these trade secrets can be

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1 found in the documents identified in response to Interrogatory No. 4. Because Waymo does not
 2 track costs on a trade secret by trade secret basis in the ordinary course of business, the cost of
 3 developing Trade Secrets 92 and 93 will be the subject of expert testimony. Information
 4 potentially relevant to determining such cost estimates has been produced at WAYMO-UBER-
 5 00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-
 6 00014078 and WAYMO-UBER-00014489. That information reflects that [REDACTED] [REDACTED]

7 [REDACTED]
 8 [REDACTED]
 9 Waymo’s consideration and development of [REDACTED]

10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 Waymo provides these examples as context for its interrogatory response, even though
 19 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
 20 complete description or analysis of its development efforts here.

Trade Secrets 9-10, 13-14, 38 and 117

21
 22 The total development work associated with Trade Secrets 9-10, 13-14, 38, and 117 took
 23 [REDACTED]. Further detail regarding the timeline for the development of these trade
 24 secrets can be found in the documents identified in response to Interrogatory No. 4, which Waymo
 25 incorporates by reference pursuant to Federal Rule of Civil Procedure 33(d). Waymo does not
 26 track costs on a trade secret by trade secret basis in the ordinary course of business, and the cost of
 27 developing Trade Secrets 9-10, 13-14, 38, and 117 will be the subject of expert
 28 testimony. Information potentially relevant to determining such cost estimates includes

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1 information that has been produced at WAYMO-UBER-00027045, WAYMO-UBER-00014506,
2 WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That
3 information reflects that [REDACTED]

4 [REDACTED]
5 [REDACTED]
6 In assessing the time it took and how much it cost to develop trade secrets related to

7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED] For
11 example, to develop Trade Secrets 9-10, 13-14, 38, and 117, Waymo spent considerable time and
12 expense [REDACTED]

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]. As another example, Waymo spent considerable time and
23 expense [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED].

4 Waymo provides these examples as context for its interrogatory response, even though
5 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
6 complete description or analysis of its development efforts here.

7 **Trade Secret 48**

8 The total development work associated with Trade Secret 48 took [REDACTED]
9 [REDACTED] Further detail regarding the timeline for the development of this trade secret can be found
10 in the documents identified in response to Interrogatory No. 4. Waymo does not track costs on a
11 trade secret by trade secret basis in the ordinary course of business, and the cost of developing
12 Trade Secret 48 will be the subject of expert testimony. Information potentially relevant to
13 determining such cost estimate has been produced at WAYMO-UBER-00027045, WAYMO-
14 UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-
15 UBER-00014489. That information reflects that [REDACTED]

16 [REDACTED]
17 [REDACTED]

18 In assessing the time it took and how much it cost to develop trade secrets related to the

19 [REDACTED]
20 [REDACTED]
21 [REDACTED]. For example, to develop Trade Secret 48, Waymo
22 spent considerable time and incurred substantial expense [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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1 [REDACTED]
2 [REDACTED]. As another example, Waymo spent considerable time and
3 incurred substantial expense [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED].

8 Waymo provides these examples as context for its interrogatory response, even though
9 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
10 complete description or analysis of its development efforts here.

Trade Secret 120

11
12 The total development work associated with Trade Secret 120 took [REDACTED]
13 [REDACTED]. Further detail regarding the timeline for the development of this trade secret can be found
14 in the documents identified in response to Interrogatory No. 4. Waymo does not track costs on a
15 trade secret by trade secret basis in the ordinary course of business, and the cost of developing
16 Trade Secret 48 will be the subject of expert testimony. Information potentially relevant to
17 determining such cost estimate has been produced at WAYMO-UBER-00027045, WAYMO-
18 UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-
19 UBER-00014489. That information reflects that [REDACTED]

20 [REDACTED]
21 [REDACTED]
22 Waymo’s development of Trade Secret 120 [REDACTED]
23 [REDACTED]
24 [REDACTED] [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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Waymo provides these examples as context for its interrogatory response, even though such context is not called for by the interrogatory. Waymo does not purport to offer a full and complete description or analysis of its development efforts here.

Trade Secret 111

The total development work associated with Trade Secret 111 took [REDACTED]. Further detail regarding the timeline for the development of this trade secret can be found in the documents identified in response to Interrogatory No. 4. Waymo does not track costs on a trade secret by trade secret basis in the ordinary course of business, and the cost of developing Trade Secret 111 will be the subject of expert testimony. Information potentially relevant to determining such cost estimate has been produced at WAYMO-UBER-00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That information reflects that [REDACTED]

In assessing the time it took and how much it cost to develop trade secrets related to the [REDACTED]. For example, to develop Trade Secret 111, Waymo spent considerable time and incurred substantial expense [REDACTED]

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1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]. As another example, Waymo spent considerable time and
 5 incurred substantial expense [REDACTED]
 6 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
 7 [REDACTED]
 8 [REDACTED].

9 Waymo provides these examples as context for its interrogatory response, even though
 10 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
 11 complete description or analysis of its development efforts here.

Trade Secrets 101 and 102

13 The total development work associated with Trade Secrets 102 and 103 took
 14 [REDACTED] Further detail regarding the timeline for the development of this trade
 15 secret can be found in the documents identified in response to Interrogatory No. 4. Waymo does
 16 not track costs on a trade secret by trade secret basis in the ordinary course of business, and the
 17 cost of developing Trade Secrets 102 and 103 will be the subject of expert testimony. Information
 18 potentially relevant to determining such cost estimate has been produced at WAYMO-UBER-
 19 00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-
 20 00014078 and WAYMO-UBER-00014489. That information reflects that [REDACTED]
 21 [REDACTED]
 22 [REDACTED]

23 Waymo’s development of Trade Secrets 101 and 102 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]
 26 [REDACTED]
 27 [REDACTED]
 28 [REDACTED]

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1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]

8 Waymo provides these examples as context for its interrogatory response, even though
 9 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
 10 complete description or analysis of its development efforts here.

Trade Secrets 7-8, 16, 19-20 and 43

12 The total development work associated with Trade Secrets 7-8, 16, 19-20, and 43 took
 13 [REDACTED]. Further detail regarding the timeline for the development of these trade
 14 secrets can be found in the documents identified in response to Interrogatory No. 4, which Waymo
 15 incorporates by reference pursuant to Federal Rule of Civil Procedure 33(d). Waymo does not
 16 track costs on a trade secret by trade secret basis in the ordinary course of business, and the cost of
 17 developing Trade Secrets 7-8, 16, 19-20, and 43 will be the subject of expert
 18 testimony. Information potentially relevant to determining such cost estimate includes
 19 information that has been produced at WAYMO-UBER-00027045, WAYMO-UBER-00014506,
 20 WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That
 21 information reflects [REDACTED]

22 [REDACTED]
 23 [REDACTED]

24 In assessing the time it took and how much it cost to develop trade secrets related to

25 [REDACTED]
 26 [REDACTED]
 27 [REDACTED]
 28 [REDACTED]

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Waymo provides these examples as context for its interrogatory response, even though such context is not called for by the interrogatory. Waymo does not purport to offer a full and complete description or analysis of its development efforts here.

Trade Secret 49

The total development work associated with Trade Secret 49 took [REDACTED]. Further detail regarding the timeline for the development of these trade secrets can be found in the documents identified in response to Interrogatory No. 4, which Waymo incorporates by reference pursuant to Federal Rule of Civil Procedure 33(d). Waymo does not track costs on a trade secret by trade secret basis in the ordinary course of business, and the cost of developing Trade Secret 49 will be the subject of expert testimony. Information potentially relevant to determining such cost estimate includes information that has been produced at WAYMO-UBER-00027045, WAYMO-UBER-00014506, WAYMO-UBER-00012830, WAYMO-UBER-00014078 and WAYMO-UBER-00014489. That information reflects that [REDACTED]

Waymo’s development of Trade Secret 49, [REDACTED]

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

1 Waymo provides these examples as context for its interrogatory response, even though
2 such context is not called for by the interrogatory. Waymo does not purport to offer a full and
3 complete description or analysis of its development efforts here.

Trade Secret 15

4
5 Waymo’s Trade Secret 15 is a solution that Waymo developed to a problem that it
6 encountered during LiDAR development. [REDACTED]

7 [REDACTED]
8 [REDACTED] Waymo
9 additionally responds under 33(d) and incorporates by reference its response to Interrogatory
10 4. Waymo’s cost to develop this trade secret will be the subject of expert testimony.

Trade Secret 17

11
12 Waymo’s Trade Secret 17 is a solution that Waymo developed to a problem that it
13 encountered during LiDAR development. [REDACTED]

14 [REDACTED]
15 [REDACTED]
16 [REDACTED] Waymo additionally responds under 33(d) and incorporates by reference its response to
17 Interrogatory 4. Waymo’s cost to develop this trade secret will be the subject of expert testimony.

Trade Secret 42

18
19 Waymo’s Trade Secret 42 is a solution that Waymo developed to a problem that it
20 encountered during LiDAR development. [REDACTED]

21 [REDACTED]
22 [REDACTED]
23 [REDACTED] Waymo additionally responds under 33(d) and incorporates by reference its response to
24 Interrogatory 4. Waymo’s cost to develop this trade secret will be the subject of expert testimony.

Trade Secrets 63 and 89

25
26 Waymo’s Trade Secrets 63 and 89 represent a solution that Waymo developed to a
27 problem that it encountered during LiDAR development. [REDACTED]

28 [REDACTED]

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

1 [REDACTED]
2 [REDACTED] Waymo additionally responds under 33(d) and incorporates
3 by reference its response to Interrogatory 4. Waymo’s cost to develop this trade secret will be the
4 subject of expert testimony.

Trade Secret 114

6 Waymo’s Trade Secret 114 is a solution that Waymo developed to a problem that it
7 encountered during LiDAR development. [REDACTED]
8 [REDACTED]
9 [REDACTED]

10 [REDACTED] Waymo additionally responds under 33(d) and
11 incorporates by reference its response to Interrogatory 4. Waymo’s cost to develop this trade
12 secret will be the subject of expert testimony.

Trade Secret 115

14 Waymo’s Trade Secret 115 is a solution that Waymo developed to a problem that it
15 encountered during LiDAR development. [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 [REDACTED] Waymo additionally responds under 33(d) and incorporates by reference its
19 response to Interrogatory 4. Waymo’s cost to develop this trade secret will be the subject of
20 expert testimony.

Trade Secret 116

22 Waymo’s Trade Secret 116 is a solution that Waymo developed to a problem that it
23 encountered during LiDAR development. [REDACTED]
24 [REDACTED]
25 [REDACTED] [REDACTED]

26 [REDACTED] Waymo’s cost to develop this trade secret will be the
27 subject of expert testimony.
28